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March 6, 2023

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VIA ECF

Hon. Judge J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Rivera, et al. v. 787 Coffee LLC, et al.

Case No. 1:22-cv-01596

Dear Judge Oetken:

This office represents Defendants in the above referenced matter. I, together with Plaintiffs' Counsel, submit this letter to request an extension of time to complete all fact discovery including completion of the parties' depositions until the parties participate in a mediation. To date, the parties completed depositions of Angel Rivera on March 2, 2023, Michele Signorile Martino on March 3, 2023, the Corporate Defendant (787 Coffee LLC) and Individual Defendant Brandon Pena's depositions were conducted on March 6, 2023. Additionally, Ty Barrett's deposition is scheduled on March 7, 2023, Isis Gamble's and Maya Keating's depositions are scheduled on March 8, 2023, Kienan Ludke's deposition is scheduled on March 14, 2023. Counsel for the parties are in the process of scheduling Allie Carter and Nina Fink's depositions that will be conducted on or before March 17, 2023.

n. Counsel for both parties request that the Court extend the discovery deadline to expire 3 weeks after parties to participate in a mediation and allow a 30-day to complete the mediation. The reason for making such request is that the parties recently has begun exploring their positions and, they need some time to explore the possibility of reaching a mutual agreement to resolve this case without further incurring fees and costs.

As such, we request that this Court to extend the time to participate in a mediation within 30 days from today's date and complete discovery, including the depositions of the remaining individuals, 3 weeks after the date of the completion of the mediation.

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We appreciate the Court's time and attention in this matter.

Respectfully Submitted,

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By: /s/ Diana Seo

Diana Y. Seo, Esq.

Attorneys for Defendants

cc: All counsel of record (via ECF)